

TO: Clerk's Office

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORKAPPLICATION FOR LEAVE
TO FILE DOCUMENT UNDER SEAL

IN RE AIR CARGO SERVICES
ANTITRUST LITIGATION

MDL No. 1775

06-MD-1775

Docket Number

SUBMITTED BY: Plaintiff X Defendant _____ DOJ _____Name: Robert N. KaplanFirm Name: Kaplan Fox & Kilsheimer LLPAddress: 850 Third Ave., 14th FloorNew York, NY 10022Phone Number: (212) 687-1980E-Mail Address: rkaplan@kaplanfox.com

INDICATE UPON THE PUBLIC DOCKET SHEET: YES X NO _____

If yes, state description of document to be entered on docket sheet:

FILED UNDER SEAL:Plaintiffs' letter brief for an order issuing a letter of request for
for international judicial assistance to compel the testimony of
of Soon Young Lee, Exhibit A and Schedule B to Exhibit A.**MANDATORY CERTIFICATION OF SERVICE:**A.) X A copy of this application either has been or will be promptly served upon all parties to this action, B.) _____ Service is excused by 31 U.S.C. 3730(b), or by
the following other statute or regulation: _____; or C.) _____ This is a criminal document submitted, and flight public safety, or security are significant concerns.
(Check one)05/04/2011
DATE/s/ Robert N. Kaplan
SIGNATURE**A) If pursuant to a prior Court Order:**Docket Number of Case in Which Entered: 599Judge/Magistrate Judge: Viktor V. PohorelskyDate Entered: 09/21/2007**B) If a new application,** the statute, regulation, or other legal basis that
authorizes filing under seal**ORDERED SEALED AND PLACED IN THE CLERK'S OFFICE,
AND MAY NOT BE UNSEALED UNLESS ORDERED BY
THE COURT.**

DATED: _____, NEW YORK

U.S. DISTRICT JUDGE/U.S. MAGISTRATE JUDGERECEIVED IN CLERK'S OFFICE _____
DATE